

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

THE ESTATE OF ANTHONY MOURADIAN,  
By Melissa Mouradian, Special Administrator

Case No. 23-CV-0167

Plaintiffs,

v.

JACKSON COUNTY,  
DUANE M. WALDERA,  
SCOTT BOWE,  
LUCAS JOHNSON,  
LINDA KELLER,  
ASHLEY HAKES,  
PATRICIA JACOBSON,  
FOOTPRINTS IN TIME MIDWIFERY SERVICES, LLC,  
JOHN DOES 2-10, and  
ABC INSURANCE COMPANY

Defendants.

---

**STIPULATION**

---

Pursuant to Federal Rule of Civil Procedure 26(a), the parties hereby stipulate that good cause exists for the entry of an order placing a stay on all discovery in the above-captioned matter until such time as Defendants', Footprints in Time Midwifery Services and Patricia Jacobson, motion to dismiss has been ruled upon by this Honorable Court.

In support of this stipulation, the parties state and agree:

- 1) Defendants Footprints in Time Midwifery Services and Patricia Jacobson were served with notice of Plaintiff's First Amended Complaint on December 5, 2023;
- 2) On December 21, 2023, Defendants Footprints in Time Midwifery Services and Patricia Jacobson filed a motion to dismiss the First Amended Complaint in its entirety,

as it pertains to Defendants Footprints in Time Midwifery Services and Patricia Jacobson, asserting the affirmative defense of the statute of limitations;

- 3) If successful, a motion to dismiss based on the statute of limitations operates as a complete bar to any future involvement in the case as a party by the successful defendant;
- 4) On January 3, 2024, Defendants Footprints in Time Midwifery Services and Patricia Jacobson were served with Plaintiff's First Set of Discovery Requests to Defendants Jacobson and Footprints in Time;
- 5) Footprints in Time and Patricia Jacobson reached out to opposing counsel, seeking a stay on having to respond to discovery and prepare for depositions in case the Court granted the motion to dismiss;
- 6) Opposing counsel, having considered the idea, would agree to the request for a stay, but only if the Court granted a complete stay of the case as it considers the motion to dismiss, as opposing counsel has concerns that allowing only Footprints in Time and Patricia Jacobson a stay could impact the prosecution of the case, expert reports, etc.
- 7) A stay on the discovery in the above-captioned matter will allow the parties and this Honorable Court to know with certainty whether there will be any further involvement for Defendants Footprints in Time Midwifery Services and Patricia Jacobson in the case as defendants, as opposed to third parties, and to determine if any changes to the existing scheduling order is necessary;
- 8) A stay on the discovery in the above-captioned matter will prevent Defendants Footprints in Time Midwifery Services and Patricia Jacobson from incurring the burden

and expense of responding to discovery requests unnecessarily if, in fact, they are successful in the dispositive motion on file.

SO STIPULATED.

Dated this 19<sup>th</sup> day of January, 2024.

CADE LAW GROUP, LLC

Electronically signed by: Nathaniel Cade, Jr.  
Nathaniel Cade, Jr.  
State Bar No. 1028115  
Attorneys for Plaintiff

Dated this 22<sup>nd</sup> day of January, 2024.

COYNE, SCHULTZ, BECKER & BAUER, S.C.

Electronically signed by: Vincent J. Scipior  
Vincent Scipior  
State Bar No. 1085069  
Attorneys for Defendant Ashley Hakes

Dated this 19<sup>th</sup> day of January, 2024.

CRIVELLO, NICHOLS & HALL, S.C.

Electronically signed by: Timothy M. Johnson  
Timothy M. Johnson  
State Bar No. 1052888  
Attorneys for Defendants Jackson County, Scott Bowe, Lucas Johnson, Linda Keller, and Duane Waldera

Dated this 19<sup>th</sup> day of January, 2024.

CORNEILLE LAW GROUP, LLC

*Electronically signed by: Jason F. Poje*

Jason F. Poje

State Bar No. 1122619

Attorneys for Defendants Footprints in Time  
Midwifery Services, LLC, and Patricia Jacobson